FSSC 22000

GUIDANCE DOCUMENT: FOOD SAFETY AND QUALITY CULTURE

Version 2 | July 2023

CONTENTS

REVISION HISTORY

Date Published	Issue	Changes
November 2020	1	First publication
July 2023	2	Updates made in line with Version 6 of the FSSC 22000 Scheme and to include reference to PAS 320:2023.

1. INTRODUCTION

GFSI defines food safety culture as "shared values, beliefs and norms that affect mindset and behavior toward food safety in, across and throughout an organization" (GFSI 2020.1).

The definition derives from existing literature on organizational and food safety culture and is made practical and applicable through the group's work.

A mature food safety culture is one in which the company vision and mission have been broken down into the finer details of expectations for every department and person throughout the organization.

2. GFSI REQUIREMENT

The GFSI benchmarking document contains the following requirement that shall be implemented by GFSI-approved Certification Program Owners (CPO) and audited onsite.

Requirement: Evidence of the senior management's commitment to establish, implement, maintain, and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of:
- Communication,
- Training,
- Feedback from employees and
- Performance measurement on food safety-related activities.

3. FSSC 22000 ADDITIONAL REQUIREMENT 2.5.8

Included in FSSC 22000 Version 6, under Part 2 of the Scheme, is the additional requirement 2.5.8 on Food Safety and Quality Culture. This requirement is applicable to all food chain categories. The requirement is aligned with the requirement of GFSI. The additional requirement 2.5.8 indicates:

a) *In accordance with and in addition to clause 5.1 of ISO 22000:2018, as part of the organization's commitment to cultivating a positive food safety and quality culture, senior management shall establish, implement, and maintain a food safety and quality culture objective(s) as part of the management system. The following elements shall be addressed as a minimum:*
- *Communication,*
- *Training,*
- *Employee feedback and engagement, and*
- *Performance measurement of defined activities covering all sections of the organization's impact on food safety and quality.*
b) *The objective(s) shall be supported by a documented food safety and quality culture plan, with targets and timelines included in the management review and continuous improvement processes of the management system.*

4. GFSI GUIDING QUESTIONS

GFSI has drafted a set of guiding questions that could be used when auditing an organization against a GFSI-approved certification Scheme.

5. FSSC 22000 GUIDANCE

This FSSC 22000 guidance document includes guidance for auditors and organizations on assessing food safety and quality culture within their organization in accordance with the FSSC 22000 Additional Requirement 2.5.8 as well as how the GFSI guiding questions link to ISO 22000:2018 and the overall FSMS.

6. GUIDANCE FOR IMPLEMENTING FOOD SAFETY AND QUALITY CULTURE

FSSC 22000 VERSION 6 ADDITIONAL REQUIREMENT 2.5.8
In accordance with and in addition to clause 5.1 of ISO 22000:2018, as part of the organization's commitment to cultivating a positive food safety and quality culture, senior management shall establish, implement, and maintain a food safety and quality culture objective(s) as part of the management system. The following elements shall be addressed as a minimum: • **Communication,** • Training, • Employee feedback and engagement, and • Performance measurement of defined activities covering all sections of the organization impacting food safety and quality.
GUIDANCE ON AUDITING THE COMMUNICATION ELEMENT
• Senior management can demonstrate their engagement with food safety by establishing expectations for every department and person throughout the organization with regard to food safety and quality culture, e.g., establish whether this is included within job descriptions. • Verify how food safety and quality culture aspects are communicated throughout the organization, e.g., establish if the organization has a communication policy and communication matrix. • Verify how top management has verified that all staff, e.g., understand food safety and quality culture expectations, verify whether this is included within induction and annual training for personnel, and whether it included an assessment of personnel's understanding. • Interview personnel on the shop floor to determine whether employees know their responsibilities and what they are accountable for in relation to food safety and quality-related tasks. Verify how personnel receive feedback on production performance and food safety/quality issues, e.g., verify if there are weekly or monthly production meetings and include feedback on production performance and food safety/quality issues. • Assess during interviews with top management whether they can explain the organization's food safety and quality expectations and how they are used in the decision-making processes. • Assess during interviews with the shop floor to which level personnel are informed on food safety and quality expectations. E.g., check the level of comfort and ease with which the auditee explains or responds when asked about the expectations, such as whether they know what to do when a non-conformance occurs. Can they describe for their section/area of work what non-conformance is?

- Assess the capability of top management to react to, e.g., customer complaints or supplier issues, in a timely and effective manner whilst ensuring the right decisions are made. This can be assessed during the interview with top management as well as when sampling customer complaints and corrective actions.
- Assess whether food safety and quality-related expectations are communicated in a language understood by the personnel on the shop floor. E.g., Look out for examples of translated materials either posted on the walls where employees work or other areas such as the canteen walls.
- Verify that training material is available and translations are in the local language and sample and examine answer sheets if written tests are used for verification of competence.

COMMUNICATION

GFSI GUIDING QUESTION	ISO 22000:2018	GUIDANCE
How do your senior leaders engage with food safety?	**Clause 5.1, d)** Top management shall demonstrate leadership and commitment with respect to the FSMS by communicating the importance of effective food safety management and conforming to the FSMS requirements, applicable statutory and regulatory requirements, and mutually agreed-on customer requirements related to food safety.	Assessment of this ISO 22000 clause shall also include the expectations for every department and person throughout the organization with regard to food safety culture.
How is your messaging used to communicate food safety expectations to all employees?	**Clause 5.2.2, a) and b)** The food safety policy shall be: a) be available and maintained as documented information; b) be communicated, understood, and applied at all levels within the organization;	Assessment of this ISO 22000 clause shall also include a detailed assessment of how food safety culture aspects are communicated throughout the organization.
Is your company's vision and mission clearly expressed so that all staff understands both?	**Clause 5.2.2, b)** The food safety policy shall be communicated, understood, and applied at all levels within the organization;	Assessment of this ISO 22000 clause shall also include how top management has verified that all staff understands food safety culture expectations.

COMMUNICATION		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
Are you confident that all employees know their responsibilities and are held accountable for their food safety-related tasks and that accountabilities are well-connected?	**Clause 5.3.1** Top management shall ensure that the responsibilities and authorities for relevant roles are assigned, communicated, and understood within the organization. **Clause 7.4.3** The organization shall establish, implement, and maintain an effective system for communicating issues having an impact on food safety. To maintain the effectiveness of the FSMS, the organization shall ensure that the food safety team is informed in a timely manner of changes in the following: a) – m).	The assessment shall be included in the interview with personnel on the shop floor. Look for evidence that feedback personnel receives on production performance and food safety issues.

Can you articulate your company's food safety expectations and how they are applied to every decision?	**Clause 4.2**
	To ensure that the organization has the ability to consistently provide products and services that meet applicable statutory, regulatory, and customer requirements with regard to food safety, the organization shall determine:
	    c) the interested parties that are relevant to the FSMS;
	    d) the relevant requirements of the interested parties of the FSMS.
	The organization shall identify, review and update information related to the interested parties and their requirements.
	Clause 6.2
	The organization shall establish objectives for the FSMS at relevant functions and levels.
		This shall be addressed when interviewing top management.
		Also, check when interviewing personnel at the shop floor to assess to which level personnel is informed on food safety expectations.

COMMUNICATION		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
Does your strategy enable you to respond quickly and effectively, with appropriate oversight, to ensure the right decisions are made?	**Clause 4.1** The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS. The organization shall identify, review and update information related to these external and internal issues. **Clause 6.3** When the organization determines the need for changes to the FSMS, including personnel changes, the changes shall be carried out and communicated in a planned manner. The organization shall consider: e) the purpose of the changes and their potential consequences; f) the continued integrity of the FSMS; g) the availability of resources to effectively implement the changes; h) the allocation or re-allocation of responsibilities and authorities. **Clause 9.3** Top management shall review the organization's FSMS at planned intervals to ensure its continuing suitability, adequacy, and effectiveness.	The top management decision-making process determines this and should be addressed during an interview with top management. Specifically, look at the capability of top management to react to, e.g., customer complaints or supplier issues.

Can you identify examples of where using industry intelligence has helped identify potential hazards or risks to your business?	**Clause 4.1** The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS. The organization shall identify, review and update information related to these external and internal issues.	Specifically, address NOTE 2 to this clause when interviewing top management. Industry intelligence is also part of understanding the context.

FSSC 22000 VERSION 6 ADDITIONAL REQUIREMENT 2.5.8

In accordance with and in addition to clause 5.1 of ISO 22000:2018, as part of the organization's commitment to cultivating a positive food safety and quality culture, senior management shall establish, implement, and maintain a food safety and quality culture objective(s) as part of the management system. The following elements shall be addressed as a minimum:

- Communication,
- **Training,**
- Employee feedback and engagement, and
- Performance measurement of defined activities covering all sections of the organization impacting on food safety and quality.

GUIDANCE ON AUDITING THE TRAINING ELEMENT

- Assess the overall training program of the organization, including the content, e.g., evaluate the 'organization's training procedure, training matrix, and records of training, and determine whether it addressed relevant topics.
- Assessment of competency during the interview of personnel on the shop floor. E.g., Check for level of comfort in having a conversation on the topic directed at any person along the production line, not just the team leaders or Supervisors.
- Verify evidence that personnel have participated in food safety training, including whether personnel undertaking activities related to CCPs and OPRPs have been trained in this regard and whether they were assessed and found competent. E.g., request retained evidence of training such as attendance registers and written tests/signed-off records of on-the-task observation and allow sufficient time to stand and observe employees at work during production and look out for good practices. This also applies to training on quality control parameters.
- Verify that the organization's training program addresses hazard and risk management controls in personnel's area of work and what actions would be taken in the case they were not adhered to. Evaluate documented evidence that this training was undertaken.

TRAINING

GFSI GUIDING QUESTION	ISO 22000:2018	GUIDANCE
When was your last food safety training, and what did you learn?	**Clause 7.2, b)** The organization shall ensure that these persons, including the food safety team and those responsible for the operation of the hazard control plan, are competent on the basis of appropriate education, training, and/or experience.	Assess the overall training program of the organization. The assessment shall also be included in the interview with personnel on the shop floor. Look for evidence that personnel have participated in food safety training.
How do you educate staff to understand why the hazard and risk management controls in their areas are so important, and what would be the consequences of not following them?	**Clause 7.3** The organization shall ensure that all relevant persons doing work under the organization's control shall be aware of their individual contribution to the effectiveness of the FSMS, including the benefits of improved food safety performance and the implications of not conforming with the FSMS requirements.	This should be addressed in the organization's training program. Assess the content of the training program and training.

FSSC 22000 VERSION 6 ADDITIONAL REQUIREMENT 2.5.8

In accordance with and in addition to clause 5.1 of ISO 22000:2018, as part of the organization's commitment to cultivating a positive food safety and quality culture, senior management shall establish, implement, and maintain a food safety and quality culture objective(s) as part of the management system. The following elements shall be addressed as a minimum:

- Communication,
- Training,
- **Employee feedback and engagement, and**
- Performance measurement of defined activities covering all sections of the organization impacting on food safety and quality.

GUIDANCE ON AUDITING THE FEEDBACK FROM EMPLOYEES' ELEMENT

- Assess when last the organization raised a food safety or quality concern whilst interviewing the food safety team (leader) and/or personnel on the shop floor. E.g., Refer to their defined process for internal communication regarding food safety and quality issues and use it to check if it is followed, confirm the target recipients and what feedback was received from them.
- Assess the specific food safety and quality concerns raised by personnel and how this has been managed by the food safety team and top management, including a review of documented evidence. Determine whether the organization has a confidential reporting system in place for employees to communicate these issues in a confidential manner. E.g., Check for what platforms have been set up by the organization to ensure open lines of communication through online chatting platforms created specifically for food safety-related issues, anonymous tip-off email or telephone numbers for employees to use, and so on.
- Assess how personnel contribute to food safety and quality in the organization whilst interviewing personnel on the shop floor. E.g., ask personnel how they communicate suggestions, whom they speak to, and when.
- Assess whether personnel are actively involved in safeguarding food safety. E.g., taking pride in their own workspace, taking accountability for themselves and one another, and looking out for following rules set per department or area of work by observing during the audit.
- Observe whether personnel are committed and adhere to the food safety and quality expectations of the organization whilst on the shop floor, e.g., observe employees entering the facility and assess whether they have followed the correct entering procedures, including hand washing and proper wearing of PPE.
- Assess whether the FSMS documentation is designed to support employees' food safety and quality decisions and behaviors. E.g., check that instructions are available and clear in a simple step-by-step guide/format and check that the latest updated information is made available at the point of use.
- Assess whether personnel are included in the design and improvement of food safety and quality-related protocols and instructions. Verify that the food safety team is involved in this and whether the food safety team and top management include personnel in this process. Assess how their feedback is received and evaluated.

•	Assess how protocols and instructions are validated on the shop floor.

FEEDBACK FROM EMPLOYEES

GFSI GUIDING QUESTION	ISO 22000:2018	GUIDANCE
When was the last time you or someone on your team raised a food safety concern?	**Clause 5.3.3** All persons shall have the responsibility to report the problem(s) with regard to the FSMS to identified person(s).	The assessment shall be done when interviewing the food safety team (leader) and/or personnel on the shop floor. Look specifically for food safety concerns raised by personnel and how the food safety team and top management have managed this.
How do you contribute to food safety in your organization?	**Clause 7.3, c)** The organization shall ensure that all relevant persons doing work under the organization's control shall be aware of their individual contribution to the effectiveness of the FSMS, including the benefits of improved food safety performance.	The assessment shall be included in the interview with personnel on the shop floor. Look for evidence that personnel are actively involved in safeguarding food safety.
To what level are people committed and acting in accordance with food safety expectations?	**Clause 7.1.2** The organization shall ensure that the persons necessary to operate and maintain an effective FSMS are competent (see 7.2).	The assessment shall be done by interviewing personnel on the shop floor. Look for evidence that personnel are actively involved in safeguarding food safety.
Is your documentation designed to support employees' food safety decisions and behaviors?	**Clause 7.5.1, b)** The organization's FSMS shall include documented information determined by the organization as being necessary for the effectiveness of the FSMS;	Specifically, address the NOTE to this clause when assessing. NOTE: The extent of documented information for an FSMS can differ from one organization to another due to: • the size of the organization and its type of activities, processes, products, and services; • the complexity of processes and their interactions; the competence of persons.

FEEDBACK FROM EMPLOYEES		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
Are employees engaged in the design and improvement of food safety-related protocols and instructions?	**Clause 5.3.2** The food safety team leader shall be responsible for: i) ensuring the FSMS is established, implemented, maintained, and updated; j) managing and organizing the work of the food safety team; k) ensuring relevant training and competencies for the food safety team (see 7.2); l) reporting to top management on the effectiveness and suitability of the FSMS.	In principle, personnel are represented by the food safety team. Look for evidence of how the food safety team and top management involve personnel or personnel representative group when developing protocols and instructions. How are protocols and instructions validated on the shop floor?

FSSC 22000 VERSION 6 ADDITIONAL REQUIREMENT 2.5.8

In accordance with and in addition to clause 5.1 of ISO 22000:2018, as part of the organization's commitment to cultivating a positive food safety and quality culture, senior management shall establish, implement, and maintain a food safety and quality culture objective(s) as part of the management system. The following elements shall be addressed as a minimum:

- Communication,
- Training,
- Employee feedback and engagement, and
- **Performance measurement of defined activities covering all sections of the organization impacting on food safety and quality.**

GUIDANCE ON AUDITING THE PERFORMANCE MEASUREMENT ELEMENT

- Assess how the organization's food safety and quality performance is measured, e.g., are food safety and quality performance targets established and monitored?
- Assessment shall be included in the interview with personnel on the shop floor, e.g., check to see if departmental targets have been set, ask how they are monitored and how often they are reported on, and request evidence.
- Verify how personnel receive feedback on production performance and food safety/quality issues, e.g., an overall company dashboard clearly showing the food safety/quality performance.
- Assess how top management evaluates food safety/quality performance. E.g., a personnel survey that is executed periodically, specifically related to food safety/quality, including the food safety and quality culture of the organization.
- Assess how complaints and nonconformance issues are managed by the organization and top management, including a review of corrective action reports. E.g., check to see if trends of similar complaints are identified and select a few reports to follow the trail of what actions have been taken, verify the level of cause analysis and sufficiency of actions taken to correct each of the issues, verify the effectiveness of the actions taken by asking if any further complaints or non-conformances of similar nature have been received.
- Assess how increased productivity affects the food safety and quality culture of the organization. E.g., are there more NCs during peak production?
- Evaluate how the organization plans for changes and manages changes, including reviewing documented evidence thereof. Assess the capability of top management to react to, e.g., customer complaints or supplier issues, by sampling customer complaints and non-conformances.
- Evaluate how the organization implements changes based on trending results, e.g., verify the output from management reviews.

• Assess the organization's management of near misses and the actions taken from near misses to drive continuous improvement, e.g., where trended data indicates the results are nearing an unacceptable level, what action is taken by the organization prior to the limit being exceeded?		

PERFORMANCE MEASUREMENT ON FOOD SAFETY-RELATED ACTIVITIES

GFSI GUIDING QUESTION	ISO 22000:2018	GUIDANCE
How is your food safety performance measured?	**Clause 9.1.2** The organization shall analyze and evaluate appropriate data and information arising from monitoring and measurement, including the results of verification activities related to PRPs and the hazard control plan (see 8.8 and 8.5.4), internal audits (see 9.2), and external audits. **Clause 9.3.2** Management review input.	The assessment shall be included in the interview with personnel on the shop floor. Look for evidence as to which feedback personnel receive on production performance and food safety issues. E.g., an overall company dashboard clearly showing the food safety performance. Also, assess how top management evaluates food safety performance. E.g., a personnel survey that is executed periodically.

How do you anticipate, manage, and respond to change, learn from the past, and prepare for the future?	**Clause 6.1.1**
	
	When planning for the FSMS, the organization shall consider the issues referred to in 4.1 and the requirements referred to in 4.2 and 4.3 and determine the risks and opportunities that need to be addressed to:
	
	  m) give assurance that the FSMS can achieve its intended result(s);
	  n) enhance desirable effects;
	  o) prevent or reduce undesired effects;
	
	achieve continual improvement.
		The top management decision-making process determines this and should be addressed during the interview with top management. Specifically, look at the capability of top management to react to, e.g., customer complaints or supplier issues.

PERFORMANCE MEASUREMENT ON FOOD SAFETY-RELATED ACTIVITIES		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**
How does what you measure (e.g., customer complaints, compliance to procedures, productivity, etc.) influence your food safety culture? Are your measurements related to volume/efficiency at the expense of food safety measures?	**Clause 9.1.2** The organization shall analyze and evaluate appropriate data and information arising from monitoring and measurement, including the results of verification activities related to PRPs and the hazard control plan (see 8.8 and 8.5.4), internal audits (see 9.2), and external audits. **Clause 10.2** The organization shall continually improve the suitability, adequacy, and effectiveness of the FSMS. Top management shall ensure that the organization continually improves the effectiveness of the FSMS through the use of communication (see 7.4), management review (see 9.3), internal audit (see 9.2), analysis of results of verification activities (see 8.8.2), validation of control measure(s) and combination(s) of control measure(s) (see 8.5.3), corrective actions (see 8.9.3) and FSMS updating (see 10.3).	Assess how the organization and top management manage complaints and non-conformance issues.

| **PERFORMANCE MEASUREMENT ON FOOD SAFETY-RELATED ACTIVITIES**		
GFSI GUIDING QUESTION	**ISO 22000:2018**	**GUIDANCE**

How do you review your "near-misses" and use this information to drive improvements in your food safety system?	**Clause 8.9.1**
	
	The organization shall ensure that data derived from the monitoring of OPRPs and at CCPs are evaluated by designated persons who are competent and have the authority to initiate corrections and corrective actions.
	
	Clause 10.3
	
	Top management shall ensure that the FSMS is continually updated. To achieve this, the food safety team shall evaluate the FSMS at planned intervals. The team shall consider whether it is necessary to review the hazard analysis (see 8.5.2), the established hazard control plan (see 8.5.4), and the established PRPs (see 8.2). The updating activities shall be based on:
	
	    p) input from communication, external as well as internal (see 7.4);
	    q) input from other information concerning the suitability, adequacy, and effectiveness of the FSMS;
	    r) output from the analysis of results of verification activities (see 9.1.2);
	    s) output from management review (see 9.3).
	
	System updating activities shall be retained as documented information and reported as input to the management review (see 9.3).
		Also included is the management of near misses in the assessment of this clause.

7. ADDITIONAL GUIDANCE BASED ON PAS 320: DEVELOPING AND SUSTAINING A MATURE FOOD SAFETY CULTURE GUIDE

The British Standards Institution (BSI) has developed a publicly available standard for use as guidance and advisory recommendations that provide further clarity for implementing food safety and quality culture.

Below are aspects to consider as established by PAS 320[3], however, in addition, the below also indicates where these aspects can be integrated within your FSMS via cross-reference to the relevant ISO 22000:2018 clauses and the inclusion of quality:

- Understanding the fundamentals of a food safety (and quality) culture and the context of the organization: *(Integrate with clause 4 of ISO 22000:2018)*
    - Defining the concept of a food safety (and quality) culture
    - Establishing the relationship between food safety (and quality) culture and the organizational culture
    - Understanding the organization's internal and external issues
- Establishing the governance for a food safety (and quality) culture: *(Integrate with clause 5 of ISO 22000:2018)*
    - Top management commitment, accountability, and consistency;
    - Defining the organization's vision, mission, and values;
    - Establishing the policy for a food safety (and quality) culture;
    - Establishing and managing organizational structure, responsibilities, accountabilities, and authorities.
- Understanding the organization's food safety (and quality) culture: *(Integrate with clause 4 of ISO 22000:2018)*
    - Determining the current maturity level of the organization's food safety (and quality) culture,
    - Determining the desired food safety (and quality) culture.
- Designing a strategic change plan to achieve the desired food safety (and quality) culture: *(Integrate with clause 6 of ISO 22000:2018)*
    - Identifying the drivers of change,
    - Establishing the organization's readiness to drive change to achieve the desired food safety (and quality) culture,
    - Mapping the needs, behaviors, expectations, and changes to the existing FSMS against the culture maturity gaps,
    - Determining food safety (and quality) risks and opportunities,
    - Setting priorities for positive food safety (and quality) culture change,
    - Establishing a change plan for the organization's food safety (and quality) culture.
- Preparing the key functions towards a food safety (and quality) culture: *(Integrate with clause 7 of ISO 22000:2018)*
    - Resources,
    - Developing competence and awareness,
    - Communicating and nudging,

- - Documentation.
- Embedding the change plan of the organization's food safety (and quality) culture into the existing FSMS: *(Integrate with clause 8.1 of ISO 22000:2018)*
    - - Managing and embedding change
    - - Managing disruptions and crises
- Evaluating the performance of the organization's food safety (and quality) culture: *(Integrate with clause 9 of ISO 22000:2018)*
    - - Monitoring and measuring
    - - Verifying
    - - Analyzing, evaluating, and reporting
    - - Management review
- Sustaining the continual improvement of the organization's food safety (and quality) culture: *(Integrate with clause 10 of ISO 22000:2018)*
    - - Continual improvement
    - - Reporting near misses
    - - Applying interventions
    - - Recognizing people and celebrating gains
    - - Updating
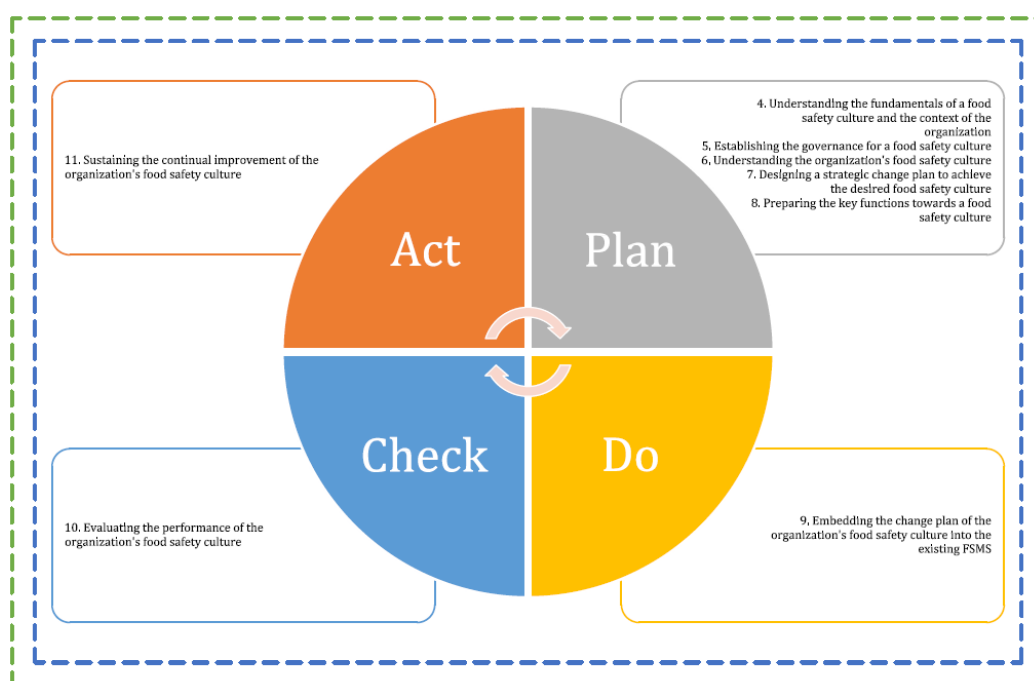
NOTE *The processes on the figure are numbered according to the clause in which they are discussed in this PAS.*

Key

- - - Organizational culture and its context
- - - Food safety culture

Figure 1 – PDCA (Plan-Do-Check-Act) cycle for Food Safety Culture[3]

PAS 320 is freely available for download from the BSI website.

8. REFERENCES

1. FSSC 22000 V6 Additional requirement
2. ISO 22000:2018 Food safety management systems – Requirements for any organization in the food chain
3. PAS 320:2023 Developing and sustaining a mature food safety culture – Guide.